1 2	Michael R. Lazerwitz (<i>Admitted Pro Hac Vice</i>) Jeremy J. Calsyn (State Bar No. 205062) Lee F. Berger (State Bar No. 222756)		
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5	(202) 974-1999 (Facsimile) mlazerwitz@cgsh.com		
6	Attorneys for Defendant		
7	LG DISPLAY AMERICA, INC.		
8	David P. Germaine (<i>Admitted Pro Hac Vice</i>) VANEK, VICKERS & MASINI 111 South Wacker Drive, Suite 4050		
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10 11	(213) 224-1510 dgermaine@vaneklaw.com		
12	Counsel for Plaintiff ATS CLAIM, LLC		
13			
14	UNITED STATES DISTRICT COURT		
15	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
16	(SAN FRANCISCO DIVISION)		
17 18	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	No. M 07-1827 SI-FS	
19 20	This Document Relates To: Case No.: 09-1115 SI	JOINT STIPULATION AND	
21	ATS Claim, LLC	[PROPOSED] ORDER REGARDING MODIFICATION	
22	Plaintiff,	OF BRIEFING SCHEDULE FOR MOTION TO DISMISS ATS	
23	VS.	CLAIM, LLC'S COMPLAINT	
24 25	Epson Electronics America, Inc.; Hitachi Ltd.; Hitachi Displays Ltd.; Hitachi Electronics Devices (USA), Inc.; Sharp Corp.; Sharp Electronics Corp.; Toshiba Corp.; Toshiba Electronic Components, Inc.; Toshiba America	Honorable Susan Illston	
26	Information Systems, Inc.; Toshiba Matsushita Display		
27			
28	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING M SCHEDULE FOR MOTION TO DISMISS ATS CLAIM, LLC'S COM Case No.: 09-1115 SI Related To Case No.: M 07-1827 SI-FS		

1 2 3 4 5	Technology Co., Ltd.; LG Display Co., Ltd.; LG Display America, Inc.; Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; Samsung Semiconductor, Inc.; AU Optronics Corp.; AU Optronics Corp. America; Chi Mei Corp.; Chi Mei Optoelectronics Corp.; Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd.; Nexgen Mediatech, Inc.; Nexgen Mediatech USA, Inc.; Chunghwa Picture Tubes, Ltd.; Tatung Company of America, Inc.; and Hannstar Display Corp.,		
6	Defendants.		
7			
8	The undersigned parties respectfully request that the following order be entered to		
9	modify the timing of the parties' respective opposition and replies with regard to LG Display		
10	America, Inc.'s ("LG Display America") motion to dismiss ATS Claim, LLC's ("ATS") complaint		
11	(the "Motion"), which the undersigned defendants joined.		
12	WHEREAS, on August 26, 2009, the presentation of the motion was continued until		
13	September 29, 2009;		
14	WHEREAS, the parties desire additional time before the rescheduled presentation of		
15	the motion to prepare and submit their briefing;		
16	NOW, THEREFORE, the undersigned parties, acting by and through their respective		
17	counsel of record, hereby stipulate and agree as follows:		
18	1. ATS's opposition shall be due on or before September 11, 2009.		
19	2. The undersigned defendants' replies shall remain due on or before September		
20	22, 2009.		
21	3. Except as set forth above, all Local Rules shall remain in effect with respect to		
22	the briefing on the motions.		
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27			
28	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MODIFICATION OF BRIEFING		

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1	IT IS SO STIPULATED.	
2	2 Res	spectfully submitted,
3	3	
4	DATED: September 1, 2009	
5	5 By	: /s/ David P. Germaine
6	6	David P. Germaine VANEK, VICKERS & MASINI
7	7	111 South Wacker Drive, Suite 4050 Chicago, Illinois 60606
8	8	(213) 224-1500 (Phone) (213) 224-1510
9	9	dgermaine@vaneklaw.com
10	0	Counsel for Plaintiff ATS Claim, LLC
11	1	Admitted Pro Hac Vice pursuant to Paragraph 9 of Pretrial Order No. 1
12	$_{2}$	(Docket No. 180, 07-1827(SI)) (July 3, 2007)
13	3	//x:1 1D T
14	<u> </u>	Michael R. Lazerwitz Michael R. Lazerwitz (PRO HAC VICE)
15	5	Jeremy J. Calsyn (State Bar No. 205062) Lee F. Berger (State Bar No. 222756)
16	6	CLEARY GOTTLIEB STEEN & HAMILTON LLP 2000 Pennsylvania Ave., NW
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19		Attorneys for Defendant LG Display America, Inc.
20		
21	By	e/s/ Bryan B. Barnhart
22		Bryan B. Barnhart Christopher A. Nedeau
23		Carl L. Blumenstein Nossaman LLP
$\begin{bmatrix} 23 \\ 24 \end{bmatrix}$		Attorneys for Defendant AU Optronics Corporation
		America
25		
26		3
27 28	IOINT STIPULATION AND [PROPOSED] ORDER RE	, LLC'S COMPLAINT

:/s/ Wayne A. Cross	
Wayne A. Cross (pro hac vice)	
John H. Chung (pro hac vice)	
Kristen J. McAhren (pro hac vice)	
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New York, NY 10036 Telephone:(212) 819-8200	
1 , ,	
Facsimile: (212) 354-8113 Attorneys for Toshiba America Ele	tronic
Components, Inc. and Toshiba Am	
Systems, Inc.	ica mjormanon
Systems, Inc.	
: /s/ Jacob R. Sorensen	
Jacob R. Sorensen	
John M. Grenfell	
Fusae Nara	
Ryan K. Takemoto	
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Attorneys for Defendant Sharp Ele	ronics
Corporation	
By: /s/ Kent M. Roger Kent M. Roger (State Bar No. 959	<u></u>
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Tel: (415) 442-1000	
Fax: (415) 442-1001	
Attorneys for Defendant Hitachi E	ctronic Devices
(USA), Inc.	
4	
4 GARDING MODIFICATION OF BRIEF	 G

1	By: /s/ Steven F. Cherry			
2	Steven F. Cherry (pro hac vice)			
	Gordon Pearson (pro hac vice)			
3	WILMER CUTLER PICKERING			
	HALE AND DORR LLP			
4	1875 Pennsylvania Avenue, NW Washington, DC 20006-3642			
5	Telephone: (202) 663-6000			
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6	Steven.Cherry@wilmerhale.com			
7	Godon.Pearson@wilmerhale.com			
8	Attorneys for Defendant Chi Mei Optoelectronics			
0	USA, Inc. and Nexgen Mediatech USA Inc.			
9				
10				
11				
11	ATTESTATION PURSUANT TO GENERAL ORDER 45			
12				
13	Pursuant to General Order No. 45, § X(B), regarding signatures, I attest under penalty of perjury the			
1.4	the concurrence in the filing of this document has been obtained from its signatories.			
14	Dated: September 1, 2009			
15	By: /s/ Michael R. Lazerwitz			
1.	Michael R. Lazerwitz			
16				
17				
18				
19	IT IS SO ORDERED.			
20				
21	Dated:			
22	Dated:			
22	HONORABLE SUSAN ILLSTON			
23				
24	UNITED STATES DISTRICT JUDGE			
25				
26	5			
27				
ر مو	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MODIFICATION OF BRIEFING			
28	SCHEDULE FOR MOTION TO DISMISS ATS CLAIM, LLC'S COMPLAINT Case No.: 09-1115 SI Related To Case No.: M 07-1827 SI-FS			

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1 2 3 4	Michael R. Lazerwitz (Admitted Pro Hac Vice) Jeremy J. Calsyn (State Bar No. 205062) Lee F. Berger (State Bar No. 222756) CLEARY GOTTLIEB STEEN & HAMILTON LLP 2000 Pennsylvania Ave., NW Washington, DC 20006 (202) 974-1500 (Phone) (202) 974-1999 (Facsimile)		
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6	Attorneys for Defendant LG DISPLAY AMERICA, INC.	,	
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11 12	Counsel for Plaintiff ATS CLAIM, LLC		
13			
14	UNITED STATES DISTRICT COURT		
15	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
16	(SAN FRANCISCO DIVISION)		
17 18	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	No. M 07-1827 SI-FS	
19 20	This Document Relates To: Case No.: 09-1115 SI	CERTIFICATE OF SERVICE	
21	ATS Claim, LLC	Honorable Susan Illston	
22	Plaintiff,		
23	VS.		
24 25 26	Epson Electronics America, Inc.; Hitachi Ltd.; Hitachi Displays Ltd.; Hitachi Electronics Devices (USA), Inc.; Sharp Corp.; Sharp Electronics Corp.; Toshiba Corp.; Toshiba Electronic Components, Inc.; Toshiba America Information Systems, Inc.; Toshiba Matsushita Display		
27 28	CERTIFICATE OF SERVICE Case No.: 09-1115 SI Related To Case No.: M 07-1827 SI-FS		

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Technology Co., Ltd.; LG Display Co., Ltd.; LG Display America, Inc.; Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; Samsung Semiconductor, Inc.; AU Optronics Corp.; AU Optronics Corp. America; Chi Mei Corp.; Chi Mei Optoelectronics Corp.; Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd.; Nexgen Mediatech, Inc.; Nexgen Mediatech USA, Inc.; Chunghwa Picture Tubes, Ltd.; Tatung Company of America, Inc.; and Hannstar Display Corp.,

Defendants.

CERTIFICATE OF SERVICE

I, Erika J. Davis, assistant managing attorney at Cleary Gottlieb Steen & Hamilton LLP, hereby certify that on September 1, 2009, a copy of the Joint Stipulation and [Proposed] Order Regarding Modification of Briefing Schedule for Motion to Dismiss ATS Claim, LLC's Complaint was served by electronic transmission through the Court's CM/ECF system. Notice of this filing will be sent to registered parties by operation of the Court's electronic filing system.

Dated: September 1, 2009

Erika J. Davis

CERTIFICATE OF SERVICE

Case No.: 09-1115 SI Related To Case No.: M 07-1827 SI-FS